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III. REMEDIAL RESPONSE PLANNING

- 1. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, Pennsylvania Department of Environmental Protection (PADEP), re: Review of a proposal to evaluate the degree to which intrinsic remediation is occurring at the site, and request for Neville Land Company to conduct additional work, 6/20/96. P. 300001-300002.
- 2. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Comments on the October 1996 Intrinsic Remediation Study Report for the Ohio River Park Site, and request for written responses, 12/31/96. P. 300003-300020. A November 26, 1996, "Well 26 from Remedial Investigation (RI)" corresponding table and graph, a November 26, 1996, "Well 27 from RI" corresponding table and graph, and a list of references are attached.
- 3. Letter to Mr. H. Vaughan Blaxter III, Neville Land Company, from Mr. Romuald Roman, U.S. EPA, re: Comments on the October 22, 1996, Intrinsic Remediation Demonstration (IRD), 1/22/97. P. 300021-300032.
- 4. Report: IRD Revision 1, Ohio River Park Site,
 Neville Township, Allegheny County, Pennsylvania,
 Volume 1, prepared by Dames & Moore (D&M), 2/27/97.
 P. 300033-300255.
- 5. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Jennifer Krueger and Mr. Stuart Edwards, D&M, re: Response to EPA's January 22, 1997, letter and addendum to the IRD Report Volume 1, 2/27/97. P. 300256-300332. Additional IRD tables and figures, Biodegradation Pathway Documentation, and a strike-through copy of the October 18, 1996, IRD are attached.
- 6. Facsimile memorandum to Mr. Romuald Roman, U.S. EPA,
- * Administrative Record File available 2/24/98, updated 9/24/98, and 10/9/98.

from Ms. Annette Paluh, PADEP, re: Transmittal of a list entitled, "Recommended Ohio River Park Site Sampling Parameters for Site Specific and Natural Attenuation Parameters" and figure 1, "Proposed Ground Water Sampling Locations in the Ohio River Back Channel," 5/14/97. P. 300333-300335. The list and figure are attached.

- 7. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Comments on the February 1997 IRD Revision 1 Report, 5/28/97. P. 300336-300339.
- 8. Facsimile memorandum to Mr. Romuald Roman, U.S. EPA, from PADEP, re: Loading to the Back Channel of the Ohio River from the Ohio River Park Site, 5/29/97. P. 300340-300345.
- 9. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Comments on the April 25, 1997, Sampling and Analysis Plan Ohio River Back Channel, 5/29/97. P. 300346-300349. Figure 1, "Proposed Ground Water Sampling Locations in the Ohio River Back Channel," and "Recommended Ohio River Park Site Sampling Parameters for Site Specific and Natural Attenuation Parameters," are attached.
- 10. Report: <u>Groundwater Quality Beneath the Ohio River</u>
 <u>Back Channel, Neville Township, Pennsylvania</u>, prepared by D&M, 8/20/97. P. 300350-300395. The following are attached:
 - a) an August 20, 1997, submittal letter to Mr. Romuald Roman, U.S. EPA, from Ms. Jennifer Krueger and Mr. Stuart Edwards, D&M;
 - b) "Status Summary on Agency Correspondence Dated January 22, 1997 (U.S. EPA) and December 31, 1996 (PADEP) Regarding the Draft Ohio River Site IRD (October 1996);"
 - c) table 1, "Summary of Production Well Construction Data, Coraopolis Municipal Water Company, Neville Township, Pennsylvania;"
 - d) table 2, "Summary of Production Well Pump Tests, West View Water Authority, Neville

Island, Pennsylvania; " and

- e) "GeoTRANS Response to EPA Comments Regarding the Basis for Layers Used in the Fate and Transport Model."
- 11. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Comments on the August 20, 1997, Supplemental Report to the IRD, entitled "Groundwater Quality Beneath the Ohio River Back Channel," 10/9/97. P. 300396-300399.
- 12. Proposed Plan, Ohio River Park Site Operable Unit Three, Neville Island, Allegheny County, Pennsylvania, 2/98. P. 300400-300437.
- 13. Letter to Mr. Romuald Roman, U.S. EPA, from Mr. Mark Stella and Mr. Stuart Edwards, D&M, re: Information on the intrinsic remediation of soil and ground water and request for EPA to consider intrinsic remediation as the selected remedy for the site ROD, 2/26/96.

 P. 300438-300471. An undated transmittal cover to Mr. Mark Stella, D&M, from Mr. Jim Mercer, GeoTrans, Inc. (GeoTrans), and an undated "Intrinsic Remediation Handout" are attached.
- 14. Letter to Mr. Romuald Roman, U.S. EPA, from Mr. H. Vaughan Blaxter III, Neville Land Company, re: Concern over the pump and treatment system for ground water remediation being included in the ROD and request for EPA to postpone issuance of the ROD until intrinsic bio-remediation can be fully evaluated or until a remedy other than intrinsic bio-remediation can be supported, 2/27/96. P. 300472-300473.
- 15. Analytical Report, prepared by Mack Laboratories, Inc., 3/15/96. P. 300474-300483. The following are attached:
 - a) a March 18, 1996, Analytical Report;
 - b) a March 12, 1996, sample analysis table, "Microseeps, DM4-962198;"
 - c) a March 12, 1996, quality control table, "Microseeps, DM4-962198;"
 - d) a March 12, 1996, sample analysis table, "Microseeps, DM5-962202;"

- e) a March 12, 1996, quality control table, "Microseeps, DM5-962202."
- Letter to Mr. Romuald Roman, U.S. EPA, from Mr. Mark 16. Stella and Mr. Stuart Edwards, D&M, re: Results of the March 10 and 11, 1996, sampling program which involved field measurements and laboratory analyses of ground water samples collected from several monitoring wells close to the anticipated location of the dissolved benzene plume, and D&M's initial assessment of the results and their implications for selection of the ground water remedy for the site, 3/27/96. P. 300484-300526. "Attachment 1, Evaluation of Intrinsic Remediation at the Ohio River Site, by Dr. James W. Mercer, GeoTrans, Inc.;" "Attachment 2, Methods and Results of March 10-11, 1996, Sampling Program, Ohio River Park Site; " and "Attachment 3, Complete Laboratory Reports for Groundwater Samples Collected During Ohio River Site Sampling Program, March 10-11, 1996" are attached.
- 17. Table, "Ohio River Park Site, Neville Island, Pennsylvania, Basic Well and Survey Data," (no author cited), 5/7/96. P. 300527-300541. The following are attached:
 - a) an August 10, 1993, ENSR Consulting and Engineering (ENSR) figure, "Approximate Location and Types of Waste Disposal Areas, Ohio River Site RI/FS, Neville Township, Pennsylvania;"
 - b) an August 11, 1993, ENSR figure, "Approximate locations of Former Trenches and Foundry Sand Piles, Ohio River Site RI/FS, Neville Township, Pennsylvania;"
 - c) a May 8, 1996, D&M figure, "Ohio River Site, Neville Township, Pennsylvania, Monitoring Well Locations;"
 - d) a May 8, 1996, D&M figure, "Ohio River Site, Neville Township, Pennsylvania, Monitoring Well Locations," with hand drawn marks showing the proposed locations of new wells;
 - e) a May 8, 1996, D&M figure, "Ohio River Site, Neville Township, Pennsylvania, Monitoring Well Locations," with hand drawn marks

- showing the proposed locations of new wells and the wells sampled during March 1996;
- f) an undated table, "Table 7-1, Proposed Minimum List of Wells to be Sampled During Intrinsic Remediation Study;"
- g) an undated GeoTrans figure, "Figure 2, Model Grid for the Neville Ohio River Site and Surrounding Area;"
- h) a May 8, 1996, D&M figure, "Ohio River Site, Neville Township, Pennsylvania, Monitoring Well Locations," with hand drawn marks showing the proposed locations of new wells and the "wells to be used in study;"
- i) a December 14, 1993, ENSR figure, "Inferred Benzene Isoconcentration Lines in Groundwater - Shallow Wells, Ohio River Site RI/FS, Neville Township, Pennsylvania;"
- j) a December 10, 1993, ENSR figure, "Inferred Benzene Isoconcentration Lines in Groundwater - Mid-Depth Wells, Ohio River Site RI/FS, Neville Township, Pennsylvania;"
- k) a December 10, 1993, ENSR figure, "Inferred
 Benzene Isoconcentration Lines in Groundwater
 Deep Wells, Ohio River Site RI/FS, Neville
 Township, Pennsylvania;"

- n) an undated outline, "Ohio River Park Site, Intrinsic Remediation Study."
- 18. Letter to Mr. Romuald Roman, U.S. EPA, from Mr. Anthony Burlando, Neville Land Company, re: Transmittal of an intrinsic remediation work plan for the site, 4/6/96. P. 300542-300543.
- 19. Letter to Mr. Romuald Roman, U.S. EPA, from Mr. Mark Stella, D&M, re: Notification that nine new monitoring wells will be installed at the site on May 28, 1996, in

- support of the ongoing intrinsic remediation study, 5/28/96. P. 300544-300545. A May 8, 1996, D&M figure, "Ohio River Site, Neville Township, Pennsylvania, Monitoring Well Locations," with hand drawn marks showing the approximate location of new monitoring wells, is attached.
- 20. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Request that the sentinel well be sampled for VOCs and SVOCs after the startup of well #8 and request that the sampling planned for after the test be conducted immediately after or just before the pumps are turned off, 7/2/96. P. 300546-300547.
- 21. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Jennifer Krueger and Mr. Stuart Edwards, D&M, re: Request for a meeting with EPA and PADEP to discuss the findings of the intrinsic remediation study and the expectations for the report, which is anticipated to be submitted in September, 7/30/96. P. 300548-300548.
- 22. Memorandum to the file from Ms. Annette Paluh, PADEP, re: Comments on the October 1996 intrinsic remediation study report, 11/27/96. P. 300549-300555.
- 23. Memorandum to Mr. Romuald Roman, U.S. EPA, from Mr. John Wilson, U.S. EPA, re: Comments on the October 1996 IRD report and concurrence with the conclusion that natural attenuation will prevent migration of benzene and 2,4,6-trichlorophenol from the site to the Coraopolis Well Field, 12/5/96. P. 300556-300563. The following are attached:
 - a) a September 9, 1997, memorandum to Mr.
 Romuald Roman, U.S. EPA, from Mr. John
 Wilson, U.S. EPA, providing comments on the
 "Groundwater Quality Beneath the Ohio River
 Back Channel," data which is supplemental to
 the IRD;
 - b) "Bioscreen Natural Attenuation Decision Support System, Air Force Center for Environmental Excellence (AFCEE)," calculation for the Ohio River Park Site;
 - c) AFCEE Bioscreen table and graph, "Dissolved Hydrocarbon Concentrations in Plume;"
 - d) AFCEE Bioscreen table and graph, "Dissolved

Hydrocarbon Concentration Along Plume Centerline."

- 24. Letter to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Comments on the October 1996 intrinsic remediation study report and reassertion that Pennsylvania's ARARs for ground water cleanup are the standards set forth in the Land Recycling and Environmental Remediation Standards Act (Act 2), 12/31/96. P. 300564-300581.
- 25. Facsimile memorandum to Mr. Romuald Roman, U.S. EPA, from Ms. Annette Paluh, PADEP, re: Transmittal of updated information on the Coraopolis public water supply wells, 1/8/97. P. 300582-300591. The information is attached.
- 26. Letter to Mr. H. Vaughan Blaxter III, Neville Land Company, from Mr. Romuald Roman, U.S. EPA, re: Comments on the October 1996 IRD, 1/22/97. P. 300592-300603.
- 27. Letter report to Mr. Romuald Roman, U.S. EPA, from Ms. Jennifer Krueger and Mr. Stuart Edwards, D&M, re: Response to EPA's January 22, 1997, letter to Neville Land Company providing comments on the IRD, 2/27/97. P. 300604-300649.
- 28. Report: <u>Sampling and Analysis Plan, Ohio River Back</u> Channel, prepared by D&M, 6/17/97. P. 300650-300660.
- 29. Letter to Mr. Romuald Roman, U.S. EPA, from Mr. Robert McHale, Roy F. Weston, Inc. (Weston), re: Transmittal of the analytical summary corresponding to the data quality report for the water samples collected on July 8 and 9, 1997, at the site, 8/21/97. P. 300661-300678. An August 21, 1997, facsimile transmittal memorandum to Mr. Romuald Roman, U.S. EPA, from Ms. Dottie Hanson, Weston, a volatile data summary, and a semi-volatile data summary are attached.
- 30. Report: Neville Land Ohio River Site, Conceptual Model and Numerical Representation, prepared by GeoTrans, (undated). P. 300679-300692. A May 31, 1996, transmittal memorandum to Mr. Mark Stella, D&M, from GeoTrans is attached.

- 31. Report: Ohio River Park Site, Intrinsic Remediation Study, Coraopolis Pumping Test Procedure, prepared by D&M, (undated). P. 300693-300699. A June 28, 1996, facsimile transmittal memorandum to Mr. Romuald Roman, U.S. EPA, from Mr. Mark Stella, D&M, is attached.
- 32. Record of Decision, Ohio River Park Superfund Site, 9/17/98. P. 300699A-300777. A September 15, 1998, transmittal memorandum to Mr. Abraham Ferdas, U.S. EPA, from Mr. Romuald Roman, U.S. EPA, is attached.
- 33. Letter to Mr. Abraham Ferdas, U.S. EPA, from Mr. Charles Duritsa, PADEP, re: PADEP concurrence with the final draft of the ROD for Ohio River Park Site Operable Unit 3, 9/28/98. P. 300778-300779.